

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JUMPMVIEW ENTERTAINMENT, LLC, *et al.* :

Plaintiffs, :

CATHERINE SCORSESE, :

Defendant. :

Case No.: 2:13-cv-03147-CDJ

**MOTION OF DEFENDANT CATHERINE SCORSESE FOR LEAVE TO FILE A
REPLY BRIEF IN FURTHER SUPPORT OF HER MOTION TO DISMISS AMENDED
COMPLAINT FOR LACK OF PERSONAL JURISDICTION OR IN THE
ALTERNATIVE, TO TRANSFER VENUE TO THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT OF NEW YORK**

Defendant Catherine Scorsese, through her undersigned counsel, respectfully submits this Motion for Leave to File a Reply Brief in Further Support of her Motion to Dismiss Plaintiffs' Amended Complaint under Rule 12(b)(2) of the Federal Rules of Civil Procedure, or in the alternative, to Transfer Venue of this Action to the United States District Court for the Southern District of New York under 28 U.S.C. §1404(a) (hereinafter the "Motion").

The grounds, authority and arguments supporting this Motion are set forth in the attached memorandum of law, and such grounds, authority and arguments are incorporated by reference herein and are a part of this Motion.

Respectfully submitted,

/s/ Alexander Nemiroff

Alexander Nemiroff

L. Evan Van Gorder

OGLETREE, DEAKINS, NASH

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Date: July 5, 2013

Attorneys for Defendant Catherine Scorsese

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JUMPMVIEW ENTERTAINMENT, LLC,
and CAMPUSLIFE PRODUCTIONS, LLC,

Plaintiffs,

CATHERINE SCORSESE,

Defendant.

Case No.: 2:13-cv-03147-CDJ

**MEMORANDUM IN SUPPORT OF MOTION OF DEFENDANT CATHERINE SCORSESE
FOR LEAVE TO FILE A REPLY BRIEF IN FURTHER SUPPORT OF HER MOTION TO
DISMISS AMENDED COMPLAINT FOR LACK OF PERSONAL JURISDICTION OR IN
THE ALTERNATIVE, TO TRANSFER VENUE TO THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT OF NEW YORK**

Defendant Catherine Scorsese, through her undersigned counsel, respectfully submits this memorandum in support of her Motion for Leave to File a Reply Brief in Further Support of her Motion to Dismiss Plaintiffs' Amended Complaint under Rule 12(b)(2) of the Federal Rules of Civil Procedure, or in the alternative, to Transfer Venue of this Action to the United States District Court for the Southern District of New York under 28 U.S.C. §1404(a) (hereinafter the "Motion").

On June 14, 2013, Ms. Scorsese filed her Motion to Dismiss Plaintiffs' Amended Complaint under Rule 12(b)(2) of the Federal Rules of Civil Procedure, or in the alternative, to transfer venue of this action to the United States District Court for the Southern District of New York under 28 U.S.C. §1404(a). Thereafter, on June 28, 2013, Plaintiffs filed their brief in opposition to Ms. Scorsese's Motion (the "Opposition Brief"). Ms. Scorsese respectfully requests that this Honorable Court grant her leave to file a reply brief to address omissions of law in the Opposition Brief, to clarify applicable legal standards, and to address new factual

allegations raised by Plaintiffs for the first time in their Opposition Brief and exhibits. The reply brief that Ms. Scorsese seeks to file with this Court is attached hereto as **Exhibit A**.

WHEREFORE, for the reasons set forth above, Defendant Catherine Scorsese respectfully requests that this Court grant the relief requested in the proposed Order accompanying her Motion for Leave to File a Reply Brief in Further Support of her Motion to Dismiss Plaintiffs' Amended Complaint under Rule 12(b)(2) of the Federal Rules of Civil Procedure, or in the alternative, to Transfer Venue of this Action to the United States District Court for the Southern District of New York under 28 U.S.C. §1404(a).

Respectfully submitted,

/s/ Alexander Nemiroff

Alexander Nemiroff

L. Evan Van Gorder

OGLETREE, DEAKINS, NASH

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Attorneys for Defendant Catherine Scorsese

**UNITED STATES DISTRICT COURT
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JUMPMVIEW ENTERTAINMENT, LLC,
and CAMPUSLIFE PRODUCTIONS, LLC,

Plaintiffs,

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CERTIFICATE OF SERVICE

I hereby certify that, on this 5th day of July 2013, a true and correct copy of the foregoing Motion for Leave to File a Reply Brief in Further Support of her Motion to Dismiss Plaintiffs' Amended Complaint under Rule 12(b)(2) of the Federal Rules of Civil Procedure, or in the alternative, to Transfer Venue of this Action to the United States District Court for the Southern District of New York under 28 U.S.C. §1404(a), along with the supporting Memorandum of Law, Exhibits, and Text of Proposed Order, were filed electronically and is available for viewing and downloading from the Court's ECF System. Counsel of record has consented to electronic service through the ECF System.

/s/Alexander Nemiroff
Alexander Nemiroff